

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,)	Case No. 16-cv-1054 (WMW/DTS)
)	
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL INSURANCE COMPANY, an Indiana corporation, and ACE AMERICAN INSURANCE COMPANY, a Pennsylvania corporation,)	
)	
)	
Defendants.)	

**DECLARATION OF ALLEN W. HINDERAKER IN SUPPORT OF FAIR ISAAC
CORPORATION'S OPPOSITION TO DEFENDANTS' MOTION FOR
LEAVE TO FILE AMENDED ANSWER**

I, Allen W. Hinderaker, declare as follows:

1. I am an attorney with Merchant & Gould P.C., and I am one of the attorneys of record for Plaintiff Fair Isaac Corporation in the above captioned matter.
2. I make this declaration on my own information, knowledge, and belief in support of Plaintiff's Fair Isaac Corporation's Opposition to Defendants' Motion for Leave to File Amended Answer.
3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the January 11, 2019 of Henry Mirolyuz. This document is filed UNDER SEAL.

4. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt of the November 13, 2018 deposition of Ramesh Pandey. This document is filed UNDER SEAL.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Expert Report of Neil J. Zoltowski With Respect to Damages, served on April 19, 2019. This document is filed UNDER SEAL.

6. Attached hereto as Exhibit 4 is a true and correct copy of Second Amended Notice of Deposition Under Fed.R.Civ.P. 30(b)(6) of Federal Insurance Company, served July 13, 2018. This document was used as Deposition Exhibit 1 in the July 31, 2018 deposition of Henry Mirolyuz as a designated witness under Rule 30(b)(6).

7. Attached hereto as Exhibit 5 is a true and correct copy of a May 26, 2009 email from Henry Mirolyuz to Richard Johnson. This document was used as Deposition Exhibit 3 in the July 31, 2018 deposition of Henry Mirolyuz as a designated witness under Rule 30(b)(6). This document is filed UNDER SEAL.

8. Attached hereto as Exhibit 6 is a true and correct copy of a September 8, 2009 email from Russell Hodey to Henry Mirolyuz. This document was used as Deposition Exhibit 4 in the July 31, 2018 deposition of Henry Mirolyuz as a designated witness under Rule 30(b)(6). This document is filed UNDER SEAL.

9. Attached hereto as Exhibit 7 is a true and correct copy of a December 6, 2010 email from Tony Zhang to Henry Mirolyuz. This document was used as Deposition Exhibit 8 in the July 31, 2018 deposition of Henry Mirolyuz as a designated witness under Rule 30(b)(6). This document is filed UNDER SEAL.

10. Attached hereto as Exhibit 8 is a true and correct copy of the cover page of the July 31, 2018 deposition of Henry Miroluz, verifying the date of deposition.

11. Attached hereto as Exhibit 9 is a true and correct copy of Amended Second Notice of Deposition Under Fed.R.Civ.P. 30(b)(6) of Federal Insurance Company and ACE American Insurance Company, served December 31, 2018. This document was used as Exhibit 179 in the January 11, 2019 deposition of Henry Mirolyuz as a designated witness under Rule 30(b)(6).

12. Attached hereto as Exhibit 10 is a true and correct copy of Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 20, served on March 21, 2019. This document is filed UNDER SEAL.

13. Attached hereto as Exhibit 11 is a true and correct copy of a September 6, 2013 email from John Sarnese to Patrick Sullivan with an attachment entitled Blaze Platform Application Usage Matrix_V3.xlsx. This document was used as Deposition Exhibit 186 in the July 31, 2018 deposition of Henry Mirolyuz as a designated witness under Rule 30(b)(6). This document is filed UNDER SEAL.

14. Attached hereto as Exhibit 12 is a true and correct copy of an October 5, 2015 meeting notice entitled: CAZ ChEAR application data validation due October 16 – review draft version and an attachment entitled CAZ ChEAR Report 2015.xlsx. These documents were produced as FED006483-84. This document is filed UNDER SEAL.

Dated: August 15, 2019

/s/ Allen W. Hinderaker
Allen W. Hinderaker